

AT _____ O'CLOCK _____
John M. Domurad, Clerk - Syracuse

9:21-CV-107 (GTS/ML)

**CIVIL
RIGHTS
COMPLAINT
PURSUANT TO
42 U.S.C. § 1983**

Plaintiff(s) in the above-captioned action, allege(s) as follows:

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

2. Plaintiff: Lorenzo Wood
Address: 9005 Old River Rd, PO Box 300
Central New York Psychiatric Center
Marcy, New York 13803

3. a. Defendant: Ann Marie T. Sullivan
Official Position: Commissioner, Forensic Service on
Address: Office Of Mental Health State Of New York
44 Holland Avenue
Albany, New York 12249

b. Defendant: Danielle Tope
Official Position: Executive Director, Bureau of Sex Offender
Treatment Center
Address: 44 Holland Avenue
Albany, New York 12229

c. Defendant: Danielle Dill
Official Position: Executive Director,
Address: Central New York Psychiatric Center
9005 Old River Rd, PO Box 300
Marcy, New York 13403

Additional Defendants may be added on a separate sheet of paper.

4.

FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

Gross Medical Negligent; Medical Intentional
Gross Deliberate Inefficiency, And Violation
OF Due Process, And Violation OF Due Process
Clause, Violation OF Equal Protection Clause, And
Violation OF Fundamental Fairness, And
Fundamental Rights, Rights, (N.Y. State Const. Art. I,
§6 and §12, USCA 6TH, 8TH, and 14TH Amendments.), And
Violation of Separation of Power, and Abuse of Authority,
by State Employees while working under Color of State.

3. Continued

d. Defendant: Deborah McCulloch
 Official Position: Executive Director
 Address: Central New York Psychiatric Center
9005 Old River Road, P.O. Box 300
Marcy, New York 13403

e. Defendant: Jeffrey Nowicki
 Official Position: Director Sex Offender Treatment Program
 Address: Central New York Psychiatric Center
9005 Old River Road, P.O. Box 300
Marcy, New York 13403

f. Defendant: Erica Saxton, Treatment Team Leader
 Official Position: Sex Offender Treatment Program, Unit 604
 Address: Central New York Psychiatric Center
9005 Old River Road, P.O. Box 300
Marcy, New York 13403

g. Defendant: Grace Saxe
 Official Position: Primary Therapist, Core Group Facilitator, Unit 604
 Address: Central New York Psychiatric Center
9005 Old River Road, P.O. Box 300
Marcy, New York 13403

h. Defendant: Provwow,
 Official Position: Doctor, Sex Offender Treatment Program
 Address: Central New York Psychiatric Center
9005 Old River Road, P.O. Box 300
Marcy, New York 13403

i. Defendant: Medical Department/Staff,
 Official Position: Sex Offender Treatment Program
 Address: Central New York Psychiatric Center
9005 Old River Road, P.O. Box 300
Marcy, New York 13403

"FACTS"

(A)

(1) In 2001, I was living in Hudson, New York, (Columbia County. My lower back was severely injured. I was unloading a Construction Truck. The Truck had Ready Mix Cement bags on this Truck.

I was unloading this Construction Truck by hand, as the Company I worked for, had a Fork lift, but the Fork lift was broke, and not operational. The Cement Mix bags I was unloading weight was 94 pounds each.

(2) While unloading this Construction Truck, with the 94 lbs Cement bags on it. Then my Lower Back got hurt, I was informed later, that L-4 and L-5 Disc in my Lower back was broke. Then after a short time. I went to the Hospital on the following Friday. I woke up the following Sunday. Except when I woke up on that Sunday I was paralyzed, as I could not move from my Neck down to my Toes.

Then my Orthopedic doctor that came to see me. He explained alot about my lower back, and that I was paralyzed from my Neck down to my Toes was not from Low Back wear.

Then the Orthopedic doctor explained, I should at the most, from my accident, unloading that truck, (2001), and the damage to my Lower Back. I might have been paralyzed from my waist down to my toes, but not from my neck down to my toes. He, the Orthopedic Doctor, he was sending me to see and be examined by a Neurology. I had a Neurology Team come and see me.

The Orthopedic Doctor also explained, that I was in such pain. The reason for the severe pain in my Lower Back was due to severe damage to my Siatica Nerve. Then after the First Operation by that Doctor, and the severe Damaged to my Siatica Nerve was permanately severe Damaged

3) Then after the (2nd) Second Operation. I have not had to suffer with continuous pain, or movement.

(B)

(1) Then I was arrested, and sentenced to (6) Six Years imprisonment.

I was treated with proper medications, and procedures, and seen State, Private, and Department of Correctional Services Facility Doctors. I did not have to suffer with pain, or denied needed medications. I have also come down with Multiple Sclerosis, (MS).

(2) I was seen by Doctors, and treated by Nurses in Downstate Correctional Facility, and slept on regular 4" to 6" mattresses and spring beds. I did not receive, or needed multiple pain medications. I also was given a Cane to use, to walk with, and steady my walking balance.

(C)

(1) Then as for the prior (19) Nineteen Years. I have not had pain, or severe pain, or multiple walking problems.

Then I came, and was placed in Central New York Psychiatric Center, Marcy, New York. Herein Central New York Psychiatric Center, Marcy, New York. Even with complete knowledge of my having been paralyzed in the past, from my Neck to my Toes. Then having (2) Two Severe Lower Back Operations, and having come down with Multiple Sclerosis, (MS). I am placed in a assigned room, with hard Plastic Bed, and Single hard Plastic Chair, and this Facility have large irregular Shape Large Sitting Chairs.

Finally, after I reported, to the Central New York Psychiatric Center Medical Department about having developing severe pain in my back, and legs. I was seen by one said Out-Side Sargent Spectolus, Doctor Shiv Bhatt. Dr. Shiv Bhatt ordered, and prescribed (3") Three Inch Egg Creasts, to be placed on the hard plastic bed, in my assigned room for me to sleep on, and reduce the pressure on my lower back, to reduce the pain in my Lower Back, and Legs, and further prescribed, and approved by Physical Therapist, (P.T.), Director Mr. Greg Paradis.

(2) Then Physical Therapist, (P.T.), Director Mr. Greg Paradis, after having multiple problems with Central New York Psychiatric Center, Marcy, New York Medical Department. P.T. Director Mr. Greg Paradis resigned and left Central New York Psychiatric Center, Marcy, New York.

Further, the Commissioner of Quality Care and Advocacy, Mr. Michael Daly, Deputy Director, Commission on Quality of Care and Advocacy

(5)

401 State Street, Schenectady, New York 12305-2397, filed a Commission on Quality of Care and Advocacy, Dated March 13th, 2013, after (2) Two Visits to Central New York Psychiatric Center, Marcy, New York.

The first visit was announced and pre-scheduled. The (2nd) Second Visit to Central New York Psychiatric Center, Marcy, New York was totally "Unannounced."

and the said Commission of Quality, Care and Advocacy, (C.Q.C.), March 13th, 2013 said Report, clearly showed Central New York Psychiatric Center, Marcy, New York was in total Violation as reported by Residents, and Patients, and their Families, and Associates, and Law Firms since 2007 until March 13th, 2013, pursuant to Assault by Staff on Patients and Residents, and the Medical Department total failure to report and file Assault and Battery Complaints by Patients and Residents, and failure to file any State and Commission Required Reports, and Documents, as fully presented in said (Witness), Commission Quality Care, (C.Q.C.), Report.

3) The said Commission Quality Care, (C.Q.C.) Report will verify the up to date total failure of Central New York Psychiatric Center, Marcy, New York to comply with Central Office, and State, and Governor Required Reports, and Adequate Medical Care and Treatment. C.Q.C. Report, dated March 13th, 2013, and verified by Dr. Shiv Bhatt, Out-side Surgeon Specialist, and Physical Therapist, Mr. Greg Paradis.

Then, for "no" presented reason. The prescribed (3") Three Inch Egg Creates were taken from me. Then after multiple letters, to the Treatment Team Leaders, of Housing Unit 604, to which I live on, and to the Treatment Team Committee Leaders, and to one said, Ms, Danielle Tope, Director of Sex Offender Treatment Program, in Albany Central Office, and to one said Ms. Ann Marie T. Sullivan, Commissioner of Forensic Services, and Office of Mental Health, Central New York Psychiatric Center, Marcy, New York. Ms. Ann Marie T. Sullivan, and Ms. Danielle Tope, addresses are, 44 Holland Avenue, Albany, New York 12229.

I have also, reportedly wrote Ms. Deborah McCulloch, Executive Director, of Central New York Psychiatric Center, Marcy, New York, and the New, Executive Director, Ms. Danielle Dill, Executive Director of Central New York Psychiatric Center, Marcy, New York, about the

wrongful removal of the Medical Prescribed (3") Three Inch Egg Creates, and of the now medical back and leg pains I am developing.

4) I have continuously been writing to the Medical Department of the wrongful removal of the (3") Three Inch Egg creates, and the severe pain in my back and legs, that has been created. Except finally after multiple letters to Ms. Ann Marie T. Sullivan, Commissioner, and to Ms. Danielle Tope, Director of Sex Offender Treatment Program, Albany, New York, and Ms. Deborah McCulloch, Executive Director of Central New York Psychiatric Center, Marcy, New York, and the New Executive Director, Ms. Danielle Dill, Central New York Psychiatric Center, Marcy, New York, and to one said Nurse Practitioner Ms. Deep, and Facility Doctor, Ms. Provoc, I receive a response stating, the (3") Three Inch Egg Create was taken due to possible contamination.

I wrote the above mentioned letters, during April 21, 2019, and continuously on April 28th, 2019, and April 29th, 2019, and April 30th, 2019, and on May 3rd, 2019, on continuously throughout the entire year of 2019, and included I wrote to the Facility Risk Management, that the Commissioner of Quality Care, said C.Q.C. Report of March 13th, 2013, clearly state and show Central New York Psychiatric Center, Marcy, New York, Risk Management had "Never" wrote or filed any of the (4) Four Required Reports, of Staff assault on Resident in the Sex Offender Treatment Program, or in Forensic Service Patient in Central New York Psychiatric Center, Marcy, New York.

5) This plaintiff and resident in Central New York Psychiatric Center, Marcy, New York has even wrote of these matters, of total Medical Gross Neglect, and the continuous severe back, and leg pains that this plaintiff has been totally suffering throughout 2019, and 2020, and continuing herein (7) Seven Days ~~in~~ weeks, (24) Twenty-four hours a day, to Mental Hygiene Legal Service, 207 Genesee Street, Utica, New York 13501, but to absolutely no avail.

6) Then with my Multiple Sclerosis being a debilitating illness, and my Siatika Nerve causing severe pain in my lower back, and my legs, I have continuously been writing to the Medical Department, Dr. Provoc, Nurse Practitioner Ms. Deep and the Commissioner and Ms. Tope Director and Ms. Danielle Dill Executive Director of

Central New York Psychiatric Center, Muncy, New York, and to Mental Hygiene Legal Service, Mr. Stephane Clark, and Mr. Lawrence Steets, Attorneys, but to no avail, to further show and prove total Medical Gross Neglect, and Medical Malpractice, and Deliberate Indifferents by the parties having been herein named.

- 7) Then, as in the Treatment Courses, as Core Group, there were regular Cushion Chairs, and Large Plastic Irregular Chairs.

I have tried to sit in the Large Plastic Irregular chairs, but with their wrong angle to sit within, caused great severe pain to my Lower back, and to the Siatica Nerve in my Back, and within my legs. I sat in the Regular Cushion Chairs. The pain became so severe in my Lower back, and within my Tail Bone, and up and down in my legs. I could not sit in those Large Plastic Red Irregular Shape Chairs.

Except, the Classroom, Direct of the Core Group, one said Ms. Grace Saxe informed me, that I am to use, and sit in the Irregular Hard Large Red Plastic Chairs. I politely explained, even in the Core Group, and to Ms. Grace Saxe. That I have been paralyzed from my Neck down to my Toes, and had (2) Two serious Lower Back Operations, and I have developed Siatica Nerve damage, as well as having Multiple Sclerosis, (MS), and to sit in the Irregular Large Plastic Chairs really cause my Lower Back, and Legs to really hurt.

From that day until this present day, Ms. Grace Saxe has deliberately has Goaght against me, and against my Medical severe Pain problems. Ms. Grace Saxe, as Director of the Core Group, since I informed her, and the Core Group, the severe pain I am in in sitting in the Large Irregular Plastic Chairs, and I do not have to suffer when I sit in the Cushion Chairs. Then Ms. Grace Saxe has had the Cushion Chairs removed from our Core Group Class Room.

Finally, even in the Six Month ISP Conference Meeting, Ms. Grace Saxe ask jokingly, since our Core Group Classes do not have cushion chairs, am I finding it easier to sit in the Large Red Plastic Chairs. This matter has been presented to the Treatment Team Leader, For Housing Unit 604, one said Ms. Erica Saxton, and to the Treatment Team Committee, and to the Medical Department, and to

Nurse Practitioner Deep, and Doctor Ms. Provow, and Facility Risk Management, and Ms. Danielle Dill, now Executive Director, Central New York Psychiatric Center, Marcy, New York, and to Ms. Danielle Tope, Director, Sex Offender Treatment Program, Albany, New York, and Ms. Ann Marie T. Sullivan, Commissioner, Forensic Service, and Office of Mental Health, Albany, New York.

Further, Ms. Grace Saxe has interrupted in my Medical Conditions, and the severe Physical and Painful problems that I am having, in the Core Group, and then in 604 Housing Unit, as Ms. Grace Saxe is down as Housing Unit 604 Primary Therapist,

Except, Ms. Grace Saxe is a Social Worker, and has all no licence, or Degree dealing with the Medical Department, and has all possible orders, for me to have a cushion donut, or additional pillows to sit on. Ms. Grace Saxe has had all additional cushions removed, and taken from me, and out of my assigned room.

8) Finally, due to the multiple letters, to Ms. Ann Marie T. Sullivan, Commissioner, and to Danielle Tope Director of Sex Offender Treatment Program, Albany, New York, and to Danielle Dill, Executive Director Central New York Psychiatric Center, Marcy, New York. I have been repeatedly seeking Medical Care and Treatment, for the severe Pain throughout my Back, and legs, and Sciatica's Nerve damage, created by being forced by Ms. Grace Saxe to sit in the Irregular Large Plastic Chairs in the Core Group.

Then I have repeatedly wrote to one said, Nurse Practitioner Ms. Wilbur and to the Medical Department of now my Neck has been really hurting alot, and hurting so much so, that it has been causing me to become really sick. I haven't received any response from her.

Then I have continuously wrote to Risk Management herein Central New York Psychiatric Center, to one said Mr. Ted Adams. His response is that I have been provided with all proper medications, and equipment herein Central New York Psychiatric Center.

Throughout July 2018 I wrote to everyone herein listed, and repeatedly to the Medical Department, and Dr. Provow, repeatedly requesting for a pillow, a Pillow Donut, and for the Egg Creates to sleep on, as the pain now throughout my Back and legs have gotten completely severe, to I can not sleep at night, to go to the Core Group, to which I do continuously keep on going even in severe pain.

9) Finally Ms. Grace Saxe laughing and scarecetically asking me, how is my Back feeling. Ms. Grace Saxe denying me to sit in cushion

Chairs in the Core Group, and presenting these matters to Risk Management, and to the Treatment Team Committee, as a Doctor, on of the Facility Medical Department, "clearly" presents Ms. Grace Saxe in total violation of Separation of Powers, as Ms. Grace Saxe is a Social Worker asking and advising Facility Treatment Team, and Risk Management as a Medical Staff, and then continuing to present the denial of pillows, or donuts for this plaintiff to sit on, and deny this plaintiff to sit on custom Chairs instead of sitting in the large Irregular Plastic Chair, is in total Violation of Abuse of Authority.

I have also repeatedly throughout all of this time, I have written to Mr. Jeffrey Nowicki, Central New York Psychiatric Center, Sex Offender Treatment Program, Marcy, New York, and on wardly to Risk Management, and received multiple responses, denying this plaintiff any relief, but also acting as Medical Staff, one said Ms. Alyssa Moskal, with all of my Medical and Legal allegations of on going Medical Gross Neglect, and Medical Malpractice, and violations of Separation of Powers, and Abuse of Authority as Treatment Team Staff, and Ms. Grace Saxe a Social Worker, acting as Medical Staff, as Treatment Team Staff acting as Facility Medical Staff.

- 10) Finally, I am finally taken to Up-State University Hospital, in Syracuse, New York. I am examined by a Specialist on Spine and Back Injuries and Problems, as well as Back Pains. Finally after reviewing X-Rays, or MRI of my Lower Back, and speaking of my Multiple Sclerosis, and my Sciatic Nerve damage, and the damage and pain I have been forced to endure, by sitting in the Irregular Large Plastic Chairs, forced by Ms. Grace Saxe, and the denying of a cushion donut, or a proper padded cushion. This Specialist informed me, of the damage of sitting in the large Red Chair is and has done to my Spine, and to the L3, and L4 disk, and with a Operation, to shave the Bone and putting a Titanium Plate/Rod in place of the disc, "all" caused by the total Negligence herein Central New York Psychiatric Center, Marcy, New York Medical Malpractice and Gross Intentional Deliberate Gross Medical Negligence, as well as the violation of Ms. Grace Saxe, pursuant to Separation of Powers, and Abuse of Authority, and Deliberate Intentional Gross Negligence, as Acting Under the Color of the State, and as Negligence by "all" herein named defendants, allowing all under studies, to deny this plaintiff medical Care and Treatment, unto the total Damage to this plaintiff Spine, L3 and L4, and Sciatica Nerve, as well as Ms. Lisa Helmer, Nurse Director herein Central New York Psychiatric Center.
- Central New York Psychiatric Center Executive Director, as well as Director, and Commissioner, and Director, in Albany, New York

all allowed Facility Staff as Ms. Grace Saxe, a Social worker, to act against the prescribed Medical Treatment and Equipment, of (3") Three Inch Egg Creates to be given to this plaintiff, and Cushions, and not having to sit in Large Red Chairs, to which created severe pain, and severe Spine and Back Damage, and all Commissioners Director, Executive Director, and Facility Director for "Years" allowed under studies to violate Out-Side Specialist prescribed Orders and Equipment for this plaintiff at bar, creating the now severe Lower Back Injuries, Disc Damage, Siatrica Nerve further damage, and as this plaintiff did contact Corona Virus 19, and severely ran a 104 temperature for several days, and had to be taken by a Ambulance to St. Elizabeth Community Hospital for a weeks or so, as with Multiple Sclerosis (MS), it reduced this plaintiff recovery rate.

This plaintiff did recover, with prayers offered in this plaintiff behalf. But Central New York Psychiatric Center, Marcy, New York, Medical Staff, and Treatment Team Staff still denied Adequate Medical Care and Treatment as plaintiff Back Pain, and Suffering, and severe Siatrica Nerve pain. To which now is Life threatening permenate Damage to my Lower Back, and to my Multiple Sclerosis, (MS), and Siatrica Nerve, as well as to my Spine and Disc, all created by Ms. Grace Saxe denying me to sit in cushion Chairs in the Core Group, and by all executive Staff to take part of the Gross Negligence Deliberat Intentional Negligence of their understudies, Kevin Central New York Psychiatric Center, Marcy, New York in the multiple letters of this plaintiff to all Commissioners, Executive Directors, and Directors to which this plaintiff has written multiple letters throughout this entire matter.

Argument Number (1) One

(1) I wrote repeated letters, hopefully seeking Medical Help, and hopeful Assistance, as I informed the screening Doctor upon my arrival herein Central New York Psychiatric Center, Marcy, New York, of 2001 while living in Hudson, New York, and unloading a truck, and lifting Cement bags. I hurt my lower back, and ended up Paralyzed in a Hospital bed, paralyzed from my Neck to my Toes. Then after (2) Two Operations. I could walk.

I also informed the screening Doctor, that I have developed Multiple Sclerosis, and severe Sciatica Nerve damage. All of which I have continuously written the Medical Department, herein Central New York Psychiatric Center, Marcy, New York, since May 11, 2016.

(2) I have been seen and examined by a Out-Side Surgeon Specialist, Doctor Shiv Bhatt, who prescribed I receive (3") Three Inch Egg Form Crates to put on the Hard Plastic Bed Central New York Psychiatric Center has.

Then I continued to write Ms. Ann Marie T. Sullivan, Commissioner, Forensic Service, and Office of Mental Health, 44 Holland Avenue, Albany, New York 12229, of all of my Medical Problems, as the State and Facility Records, and Ms. Ann Marie T. Sullivan Records will show my Multiple Sclerosis, (MS), and absolutely nothing being done for it, and having severe damage to my Spine, and to my L3 and L4 Disc, to which severely damaged by Ms. Grace Saxe, Social Worker, who Central New York Psychiatric Center Marcy, New York, assigned Ms. Grace Saxe, the Social Worker, as a 604 Housing Unit, Primary Therapist, and a Core Group Director, who has written Medical Denial Request against this plaintiff, that caused this plaintiff to loose the (3") Three Inch Egg Form Crates, and has caused the cushion chairs to be removed from the plaintiff assigned Core Group, and forcing this plaintiff as further ordered by Ms. Grace Saxe, to sit in the Irregular Large Plastic Chairs, that caused this plaintiff severe multiple pain to this plaintiff lower back, and legs, and finally Severe pain to this plaintiff Neck. This plaintiff at bar has called the Office of Ms. Ann Marie T. Sullivan, Commissioner of Forensic Services, and Office of Mental Health, 518-474-4403.

(3) Then this plaintiff wrote repeated letters, to Ms. Danielle Tope, Director of the Sex Offender Treatment Program, Central New York Psychiatric Center, Marcy, New York, and this plaintiff has also called and spoke with Ms. Danielle Tope, 518-474-8207, and has reported the Lack of Medical Attention, and Lack of medical care that this plaintiff at bar has "NOT" received, and the ugly severe PAIN this plaintiff has continuously been within.

(4) I further wrote and made multiple claims, and allegation with Central New York Psychiatric Center, Marcy, New York, Risk management, of Medical Negligence, Malpractice, and Gross Deliberate Indifference created by said Facility Medical Department, and violation by said Ms. Grace Saxe, Social Worker, pursuant to Separation of Powers, as Ms. Grace Saxe given Medical opinions and Medical Denials concerning this plaintiff Medical Conditions to said Treatment Team Leaders, and Facility Treatment Team Committee, and total Abuse of Authority by Ms. Grace Saxe in Ordering this plaintiff to sit in the large Irregular Plastic Chairs, and ordering the regular Cushion chairs to all be removed from the Core Group Classroom, of the plaintiff said Core Group, to which Ms. Grace Saxe is said Core Group teacher/Director to which this plaintiff is to Attend as Program Assigned Group and, or Program.

(5) This plaintiff at bar due to the continuous severe pain I was in, in my Back, and up and down my legs, to where I could not bend my Left ankle, I wrote Facility Doctor, Ms. Provow on April 28, 2019 and wrote how the prescribed ordered (3") Three Inch Egg Crates that Dr. Shir Bhatti, the Out-Side Surgent Special ordered, but his Original Order was for (6") Six Inch Form Egg Crates, but I was given (3") Three Inch Form Egg Crates. I wrote and informed Doctor Ms. Provow how for some unknown reason, the (3") Three Inch Form Egg Crates were taken off my bed, and out of my assigned room. I explained, since the removal of the Egg Crates, my Spine and Back, as well as my legs have been seriously hurting and getting worse and worse each day.

I also wrote Nurse Practitioner one said Ms. Deep on April 29th, 2019. Then I wrote again, due to the severe Back pains, and pains in my legs, and finally in my Neck began to hurt continuously. I also wrote Facility Risk management of these matters. I finally wrote to Ms. Deborah McCulloch, Executive Director also on April 29, 2019. Again I wrote of all of these matters, and of the increasing severe pain now in my Neck, in my Back and up and down my legs and the severe pain caused by the Satica Nerve damage, I wrote Danielle Dill, Central New York Psychiatric Center, Marcy, New York Executive Director about all of

these matters on April 29th, 2019. I continued to write Doctor Ms. Provow on April 29th, 2019, and again to Facility Risk Management of these on going matters. I further wrote the New Executive Director of Central New York Psychiatric Center, Marcy, New York on said Ms. Danielle Dill, and of the severe pain I was now within, in my Neck, Legs, and Back, and how I am also having pains due to my Multiple Sclerosis, (MS) and of my Spatica Nerve damage that causes severe pain in my Legs, and in my Lower Back.

I wrote Nurse Practitioner Ms. Deep, and Doctor Ms. Provow, again on April 30th, 2019. I wrote about Social Worker Ms. Grace Saxe, and of Ms. Grace Saxe changes on Housing Unit 604, and within said Core Group to Dr. Provow and Ms. Dill on May 1st, 2019 and on May 3rd, 2019 to Ms. Deep Nurse Practitioner, and Doctor Provow

6) I have repeatedly been writing for help and Lack of Medical Negligence, and Deliberate Indifference since May 11th, 2016. I finally I received a Response from Facility Risk Management one said Ted Adams, to continue to cooperate with facility providers, and bring all medical conditions to plaintiff Treatment Team Providers. Since May 11th, 2016 I notified Ted Adams, to receive this above presented response.

7) I have included in my letters, request for my up-dated medical records, a New York State Freedom of Information, (F.O.I.A.) Request, and a United States Constitutional Freedom of Information Act, (F.O.I.A.), Request. Except, I have not received "any" medical care or treatment from the Facility Doctors, as Dr. Provow, or from the Facility Medical Staff, only Medical Denials, and Medical Restrictions imposed by Social Worker, Ms. Grace Saxe

8) Due to the multiple letters, and phone calls, and on Housing Unit 604 conversations with Treatment Team 604 Housing Unit Ms. Erica Saxton, and with Ms. Ann Maria T. Sullivan, Commissioner, of Forensic Service, and Office of Mental Health, with all notice covers Central New York Psychiatric Center, Marcy, New York, and Ms. Danielle Tope, Director, Sex Offended Treatment Program, Central New York Psychiatric Center, Marcy, New York, and Mr. Jeffrey Nowicki, Director, Central New York Psychiatric Center, Marcy, New York, and Social Worker and Housing Unit Primary Therapist, and Core Group Director Ms. Grace Saxe, and Doctor Provow, as Central New York Psychiatric Center, New York Medical Doctor, and Central New York Psychiatric Center, Marcy, New York Medical Department.

Therefore, as quoted by the United States Second Circuit, in Williams v. Smith, 781 F.2d 319, 323-24, (2d Cir. 1986), stated, Second Circuit detailed various ways in which a defendant can be personally involved in a Constitutional deprivation, and thus be subject to "individual liability."

In this matter of total Medical Negligence, and multiple Malpractice, in not treating this plaintiff with Spinal Damage, and Siatica Nerve Damage, and Multiple Sclerosis, as presented upon this plaintiff arrival within Central New York Psychiatric Center, Marcy, New York October 2nd, 2014,

then Dr. Proulx, and the medical Department, as well as the Commissioner, Ann Marie T. Sullivan, and Ms. Danielle Tope, Director of Sex Offender Treatment Program, Albany, New York, as well as Ms. Deborah Mc. Culloch, Executive Director Central New York Psychiatric Center, Marcy, New York, and Mr. Jeffrey Nowicki, Director Sex Offender Treatment Program, Marcy, New York "all" allowed Social Worker Ms. Grace Saxe, to inflict pain and suffering upon this plaintiff as ordering the removal of cushion chairs from the Core Group Treatment Program Group, even knowing of this plaintiff Spinal Damage, and Medical Siatica Nerve Damage, and plaintiff having Multiple Sclerosis, to repeatedly inflict pain and suffering upon this plaintiff, and in Facility (6) Six Month Program Review Conference, (I.S.P.), Ms. Grace Saxe is known for making laughing gestures and comments of this plaintiff medical conditions and problems, and her attacks at this plaintiff "not" being allowed to sit in Facility cushion chairs, but only be forced to sit, not allowed to stand, but forced to sit in the large Irregular Red Chairs,

then Supervisors not interceding in these matters repeatedly presented by this plaintiff to "all" Supervisors, Commissioner Ann Marie T. Sullivan, Director Sex Offender Treatment Program, Albany, New York, Ms. Danielle Tope, and Executive Director Deborah Mc. Culloch, Central New York Psychiatric Center, Marcy, New York, Mr. Jeffrey Nowicki, Director Sex Offender Treatment Program Central New York Psychiatric Center, Marcy, New York, and Ms. Erica Saxton, Treatment Team Leader, and Treatment Team Leader Housing Unit 604, brought on by repeatedly by Social Worker, Ms. Grace Saxe again "all" of this plaintiff at bar Medical Conditions, in total violation of New York state Laws, and Facility Guide Lines, and violations of Office of Mental Health, and Psychiatric Care and Advocacy Rules, Regulations, and Laws,

Furthermore, a Supervisory Official is personally involved "if" that Official directly participated in the infraction, herein the Commissioner of Corrections Brian Fischer, sent, forwarded this plaintiff Letter, FOIL and FOIA Request, therefore as in this case at bar this plaintiff in meetings, phone calls, and multiple Letters, and Facility Request for Meetings with Particular Staff, will include "all" herein staff as Supervisory Officials may

may be personally involved if she or he were grossly negligent in managing subordinates who caused or created the unlawful condition or event. *Id.*, see also, Iqbal v. Hasty, 490 F.3d 143, 152-53, (2d Cir. 2007), citing Colon v. Caughlin, 58 F.3d 865, 873, (2d Cir. 1995), *rev'd on other grounds*, Ashcroft v. Iqbal, 556 U.S. 662, 678, (2d Cir. 2009).

Then as Commissioner Ann Marie T. Sullivan, and Ms. Danielle Tope, Director Sex Offender Treatment Program, Central New York Psychiatric Center, Marcy, New York, Ms. Danielle Bill, New Acting Executive Director, and former Executive Director, Central New York Psychiatric Center, Marcy, New York, and Mr. Jeffrey Nawicki, Director, Sex Offender Treatment Program Central New York Psychiatric Center, Marcy, New York, and said Ms. Erica Saxton, Treatment Team Leader, are herein named defendants, as all of these matters dealing with Ms. Grace Saxe inflicting pain and repeated suffering upon this plaintiff repeatedly, cause these herein defendants yearly, and monthly Personal Involvement, as 'Personal Involvement will be found ... where a Supervisor official received and acts on a prisoner's grievance, as in this instant case at bar, alone with personal Letters, and Request Slips for Interview, and phone calls, this plaintiff at bar repeatedly filed Facility Risk Management Forms, and Request Slips, all of which created Risk Management Personal to Interview the Complaint Personal, and Supervisor's of Complaint Personal, as in this case, Medical Department, Dr. Provow, Ms. Grace Saxe, and failure to respond, Boddie v. Morgenthau, 342 F. Supp. 2d, 193, 203, (S.D.N.Y. 2004), quoting Johnson v. Wright, 234 F. Supp. 2d 352, 363, (S.D.N.Y. 2002), see also

9) Then as Social Worker, Ms. Grace Saxe, and Classroom Core Group Director/Facilitator, began to make Medical Diagnosis of this plaintiff at bar back injuries, and Siatica Nerve damage as having the cushion chairs removed from her, and on this plaintiff Core Group Class, and informed this plaintiff, that this plaintiff could not go into other Class rooms, that had on had no classes, and bring the cushion chairs into her Classroom. Then, as this plaintiff (3") Three Inch form Egg Crate removed from this plaintiff room, as Preordered by Out-Side Surgeon Specialist Dr. Shir Bhatt. This plaintiff wrote multiple Letters, and filed a complaint with Facility Risk Management, equal to a Prison Grievance.

Except, the response this plaintiff received, was there was No Medical Order on Record, Ordering this plaintiff to receive the Three Inch form Egg Crate. Except, if there was "No" order, then why was the Three Inch form Egg Crate originally given to this plaintiff at bar, and this plaintiff

allowed to have the Three Inch Form Egg Crate "?"

Due to the multiple letters, Phone calls, Facility Request Slips to see and speak with Housing Unit 604 Treatment Team Leader Ms. Erica Saxton, and Central New York Psychiatric Center Executive Director Deborah McCulloch, and with New Executive Director Danielle Dill, and with Sex Offender Treatment Program, Director Jeffrey Nowicki, and with Doctor, Dr. Provone, "A Court may take judicial notice of a public record pursuant to Federal Rule of Evidence 201(b). Rothman v. Grogan, 220 F.3d 81, 92, (2d Cir. 2000).

Wherefore clearly showing this plaintiff at bar arrived within Central New York Psychiatric Center, Marcy New York, and informed the Facility Screening arrival Doctor, of all of this plaintiff's prior and present medical problems and conditions, and informed "all" Albany New York Commissioners, and Director, and Central New York Psychiatric Center, Marcy, New York Executive Directors, and Directors and Treatment Team Leaders and Committees, and Doctor, and medical staff of the exs's pain, and suffering Social Worker and Core Group Instructor, Ms. Grace Saxe was causing and inflicting upon this plaintiff at bar, and "NO" one not even after "all" Supervisors were notified, and made record to Facility Risk Management, all records will clearly show and prove "all" of these matters to be true and correct, and presenting Williams v. Smith, 781 F.2d 319, 323-24, (2d Cir. 1986), holding guard and superintendent were not entitled to qualified immunity as they held the hearing where the inmate was denied due process, Turpin v. Mailet, 619 F.2d 196, 202, (2d Cir. 1980), cert. denied Sub Nom. Turpin v. City of West Haven, 449 U.S. 106, 101 S.Ct. 577, 66 L.Ed2d 475, (1980), "noting that Officials may be held liable for not adequately training or supervising their employees." Further United States District Court Judge, Andrew T. Baxter, United States Magistrate Judge stated, "In Williams v. Smith, 781 F.2d 319, 323-24, (2d Cir. 1986), the Second Circuit detailed the various ways in which a defendant can be personally involved in a Constitutional deprivation, and thus be subject to individual liability," describing all of the herein named defendants at bar. Then as herein this Complaint, the writing allegations and incorporated facts herein mentioned, and herein being presented, which matters the Court can take judicial notice. Portillo v. Webb, No. 16-cv-4731 (VEC/GWG), 2017 WL 4570374, at *1 (S.D.N.Y. Oct. 11th, 2017), citing Cortec Indus. Inc. v. Sum Holding L.P., 949 F.2d 42, 47-48 (2d Cir. 1991), A Court

may take Judicial Notice of a Public Record pursuant to Fed. R. Evid. 201(b), Rothman v. Gregor, 220 F3d 81, 82, (2d Cir. 2000).

Defendants' may have been personally involved "if" after learning, and knowing of the Medical Gross Negligence, and total Lack of Medical Care and Treatment, and of Social Workers, Ms. Grace Saxe deliberate indifference against this plaintiff at bar, the Supervisors, Commission, Director, Executive Directors, and Treatment Team Leaders, and Risk management Director, and Doctor and Nurse Practitioner did nothing to stop Ms. Grace Saxe intentional pain and suffering inflicted on this plaintiff at bar, can be clearly charged with liabilities and not shielded by immunities, as Supervisors "failed" to remedy the wrong(s) inflicted against this plaintiff at bar. Id. William v. Smith, 781 F2d 319

10) Then, this Claim against the herein Named defendants at bar, and the Medical Malpractice, and Medical Negligent, and inflicting pain and suffering against this plaintiff is clear and plain to see, and finally in 2020, this plaintiff receives X-Rays and a MRI of this plaintiff lower back, and is informed of sleeping on the facility hard Plastic Bed, and being forced to sit on the Irregular Red Large Plastic Chairs, as seriously damaged L3 and L4 Disc, and has caused serious damage to plaintiff Spine, and Sciatica Nerve, and "... to state a Claim, the Complaint must contain sufficient factual matters, acceptable as true, to state a Claim that is "plausible on its face." Ashcroft v. Iqbal, 556 U.S. 662, 678, (2009), quoting Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007).

As stated in prior cases, a Courts' consideration is limited to Factual allegations as stated in said complaint and incorporated statements and allegations, of which the Court can take judicial notice. Portillo v. Wedd., No 16-cv-473 (UEC/GWG), 2017 WL 4570374, at *1, (S.D.N.Y. Oct. 11th, 2017), quoting Brass v. Am. Film Tech., 987 F2d 142, 150, (2d Cir. 1993), citing Cortec Indus. Inc. v. Sum Holding L.P., 949 F2d 42, 47-48, (2d Cir. 1991), A Court may take Judicial Notice of a Public Record pursuant to Fed. R. Evid. 201(b). Rothman v. Gregor, 220 F3d 81, 82, 92 (2d Cir. 2000).

Argument (2) Two.

"Qualified Immunity shall NOT Apply" To Any of the said herein Named Defendant(s) at Bar.

Ann Marie T. Sullivan, Commissioner, Forensic Services, and Office of Mental Health, 44 Holland Avenue, Albany, New York 12229,

Danielle Tope, Director, Sex Offender Treatment Program, 44 Holland Avenue, Albany, New York 12229,

Deborah McCulloch, Executive Director, Central New York Psychiatric Center, 9005 Old River Road, P.O. Box 300, Marcy, New York 13403,

Danielle Bill, Executive Director, Central New York Psychiatric Center, 9005 Old River Road, P.O. Box 300, Marcy, New York 13403,

Jeffrey Nowicki, Director, Sex Offender Treatment Program, Central New York Psychiatric Center, 9005 Old River Road, P.O. Box 300, Marcy, New York 13403,

Erica Saxton, Housing Unit 604, Treatment Team Leader, Sex Offender Treatment Program, Central New York Psychiatric Center, 9005 Old River Road, P.O. Box 300, Marcy, New York 13403,

Grace Saxe, Social Worker, Sex Offender Treatment Program, Housing Unit 604 Primary Therapist, and Core Group Facilitator, Central New York Psychiatric Center, 9005 Old River Road, P.O. Box 300, Marcy, New York 13403,

Ted Adam, Coordinator Facility Risk Management, Central New York Psychiatric Center, 9005 Old River Road, P.O. Box 300, Marcy, New York 13403,

Dr. Provow, Facility Doctor, Central New York Psychiatric Center, 9005 Old River Road, P.O. Box 300 Marcy, New York 13403,

Medical Unit/Department, Sex Offender Treatment Program, Central New York Psychiatric Center, 9005 Old River Road, P.O. Box 300, Marcy, New York 13403,

Grace Saxe, Social Worker, Housing Unit 604 Primary Therapist, Core Group Treatment Program Facilitator, Sex Offender Treatment Program, Central New York Psychiatric Center, 9005 Old River Road, P.O. Box 300, Marcy, New York 13403,

1) Defendant can not hide behind the shield of professional judgment in order to avoid liability for conduct that violated plaintiff otherwise clearly established rights. Vitek v. Jones, 445 U.S. at 495.

Qualified Immunity shield public officials performing discretionary duties from liabilities for civil damages. "as long as their conduct does not violate clearly established statutory or Constitutional rights of which a reasonable person would have known." Taravella v. Town of Walcott, 599 F3d 129, 133, (2d Cir. 2010), quoting Gilles v. Repicky, 511 F3d 239, 243 (2d Cir. 2007).

2) All of the herein Named, defendants' had multiple Letters, Facility Request Slips requesting to see or speak further about the Medical Malpractice, Lack of Medical Care and Treatment, and Abuse of Authority, and Separation of Powers by Grace Saxe as Social Worker and Conducting Medical advice, and conduct, and creating severe pain and suffering to this plaintiff at bar.

The burden is on a defendant to establish qualified immunity. "Because qualified immunity is an affirmative defense it is incumbent upon the defendant(s) to plead, and adequately develop, a qualified immunity defense during pretrial proceedings." Zellner v. Summerlin, 494 F3d 344, 368, (2d Cir. 2007).

Courts engage in a two-part inquiry, whether the facts shown "make out a violation of a Constitutional right," and "whether the right at issue was clearly established at the time of defendants' alleged misconduct." *Id.* (Citing Pearson v. Callahan, 129 S.Ct. 808, 815, (2009).

Although a better factual basis for affording qualified immunity to one or more of the defendants here may arise during the course of discovery. The Court can not now, accepting all of plaintiff allegations as true, conclude that defendants are entitled to qualified immunity as a matter of Law. See Johnson v. Newburgh Enlarged School District, 239 F3d 246, 255, (2d Cir. 2001).

3) Further, as each herein Named defendant was working under the Color of the State supposedly performing their Legal and Constitutional duties performing the duties of the Legal and Constitutional rights of this plaintiff at bar, which were violated by all herein named defendants herein named, "Since this Section by its very terms admit no immunities, but rather imposes liabilities upon "every person" who, under the Colors of State Laws, deprived another of his or her Civil Rights, Courts are naturally loath to clothe any person with immunity which would frustrate design of this section of providing vindication of those wronged by misuse of State power. Marrero v. City of Hialeah, 101 S.Ct. 1353, 450 U.S. 913, 67 L.Ed2d 337.

Then, as Commissioner, Executive Directs, Directors, and Treatment Team Leaders, Doctors', Medical Staff, having Authority over

other State Employees as herein this Case at bar, are in total violations of State Laws, and State Requirements, and Constitution, New York State Constitution Article 1, §6 Due Process, and United States Constitution 14 Amendment, pursuant to 14th Amendment, pursuant to Due Process Clause, and further see Williams v. Smith, 781 F.2d 319, 323-24 (2d Cir. 1986), holding guard and Superintendent were not entitled to qualified immunity defense where they administered a disciplinary hearing during which inmate was deprived of due process; Turpin v. Mailet, 619 F.2d 126, 202, (2d Cir. 1980), cert. denied sub nom. Turpin v. City of West Haven, 449 U.S. 106, 101 S.Ct. 577, 66 L.Ed.2d 475, (1980), noting that officials may be held liable for not adequately training or supervising their employees.

Argument (3) Three

"Right To Adequate Medical Care, Eight Amendment Guarantee Against Cruel And Unusual Punishment."

- 1) This plaintiff entered Central New York Psychiatric Center, Marcy, New York, and informs a screening Doctor of this plaintiff being injured unloading a truck, with Cement Bags, and ends up in a Hospital Bed paralyzed from plaintiff Neck to plaintiff Toes. Then after (2) Two serious Spinal Operations. This plaintiff could move. This plaintiff describes the Orthopedic Doctor that did the Original Operations, informed this plaintiff that this plaintiff had serious Siatica Nerve damage, and Spinal damage. This plaintiff also informed the arrival screening doctor that this plaintiff had, and suffers from Multiple Sclerosis.
- 2) Then one said, Out-Side Sargent Special Dr. Shir Bhatt, examines this plaintiff, as this plaintiff began to have severe back and leg pains. It was found the Back and Leg pains this plaintiff was suffering from was from the Hard Plastic Bed this plaintiff was laying on, and from the Irregular Large Red Plastic Chairs this plaintiff was sitting in. Dr. Shir Bhatt ordered the Large (6") Six Inch Foam Egg crate for this plaintiff to sleep.
- 3) Then as time went by, for some unknown reason, a one said Social Worker, Ms. Grace Saxe, who is also, entitled Primary Therapist, for Housing Unit 604, this plaintiff Housing Unit, and Ms. Grace Saxe, is also Facilitator for this plaintiff Therapeutic Core Group. Then as this plaintiff while entering the Therapeutic Core Group, this plaintiff would sit in the cushion chairs, due to this plaintiff lower Back Injuries, and Siatica Nerve damage. To which this plaintiff did tell Ms. Grace Saxe, and the Core Group. Then Ms. Grace Saxe had the cushion chairs removed from the Core Group. This plaintiff Not knowing Ms. Grace Saxe had the cushion chairs removed from the Core Group. This plaintiff went into one of the other classrooms on the mall Classroom floor, and got one of the cushion chairs to sit in, as the Large Irregular hard Red Plastic Chairs really hurt this plaintiff Back and Legs. Except Ms. Grace Saxe informed this plaintiff NOT to bring one of the Cushion Chairs, in, to the Core Therapeutic Room, but this plaintiff was to sit in one of the Irregular Large Red

hard chairs,

- 4) With all due respect, this plaintiff at bar, began to write Facility Request Slips, to the medical Department, request to be able to sit in the cushion chairs on the classroom mall. This plaintiff explained the Large hard Red Plastic Chairs cause this plaintiff's Back and Legs to severely hurt.

This plaintiff uses a metal walker to walk with, but after sitting in the Large Red Plastic Chairs, this plaintiff's Back and Legs hurt so bad, this plaintiff even with a walker, this plaintiff's Back and Legs hurt so much, it is extremely hard for this plaintiff to walk, even to walk to the mess hall for meals.

Then for no reason, the TA's, civilian like Grands came and took this plaintiff (3") Three Inch foam Egg crates. Even the Dr. Shir Blatt ordered (6") Six Inch foam Egg crates for this plaintiff to sleep on.

- 5) Ms. Grace Saxe files orders, with the G4 Housing Unit TA's, that this plaintiff is to sit in the Irregular Large Red Plastic hard chairs. Then as this plaintiff was to receive a Donut to sit on. This plaintiff has never received a Donut, and never received the Egg crate back, Ms. Grace Saxe, as a Social Worker, has filed Records, complaining about this plaintiff's Medical Needs, and Medical Equipment ordered by Doctors.

Ms. Grace Saxe, as a Social Worker denying this plaintiff's Medical needs, and Doctor prescribed equipment. Ms. Grace Saxe is in total violation of Separation of Powers, as Ms. Grace Saxe is a Social Worker, and has denied, and filed denial of this plaintiff's Medical Needs, and Medical Equipment. Ms. Grace Saxe and as Ms. Grace Saxe is further in total violation of Abuse of Authority, Committee Conferences, Ms. Grace Saxe is noted for making as in Core Group and I.S.P. meetings, jokes and irregular committees and laughter committees against this plaintiff.

- 6) Finally, this plaintiff at bar, has not received any Treatment, or Care for this plaintiff's Multiple Sclerosis, and receives absolutely no care or treatment for this plaintiff's Siatia Nerve damage, or for this plaintiff's Back Injuries.

- 7) Then this plaintiff after how many years, this plaintiff does see and is examined by a Orthopedic Specialist at Syracuse, New York Up-State University Hospital that verified sitting in the Irregular Large Red hard Plastic Chairs cause severe pain, and damage to my L3 and L4 Disc, and caused the wedge between L3 and L4 to wear-out, to further verify Ms. Grace Saxe attacks against me, were without merit, and a Abuse of Authority and with no knowledge

of medical care or treatment, and said Orthopedic Specialist in Up-State University Hospital, further informed me, due to the total on going damage to the L3 and L4 Disc, a operation is totally needed, to shave down the bone and put in a Titanium Plate/Rod in place of the Disc, all due to the lack of medical care, and lack of medical treatment, and caused by Medical Negligence by Dr. Provow, and the Medical Department for not interceding in my behalf against Ms. Grace Saxe,

and against Ms. Ann Marie T. Sullivan Commissioner and Ms. Danielle Tope, Director, Sex Offender Treatment Program, and against Ms. Deborah McCulloch, Executive Director, Central New York Psychiatric Center, Marcy, New York, and new Executive Director, Danielle Dill, Central New York Psychiatric Center, Marcy, New York, and against Jeffrey Nowicki, Director, Sex Offender Treatment Program, Central New York Psychiatric Center, Marcy, New York, and against Doctor, Dr. Provow, and Central New York Psychiatric Center, Sex Offender Treatment Program, Marcy, New York, and Sex Offender Treatment Team Medical Department, and against Ms. Erica Saxton, Treatment Team Leader, G4 Housing Unit, Central New York Psychiatric Center, Marcy, New York, Marcy, New York, and fully against Social Workers, Ms. Grace Saxe, Primary Therapist G4 Housing Unit, and Facilitator of Therapeutic Core Group in violation of Separation of power, and Abuse of Authority.

Then, as the Commission of Quality Care, and Advocacy Report of March 13th, 2013, clearly showed and stated, each time a Risk Management Report was made, a additional Report is to be made and sent to the Commissioner Mental Health Office, and to the Governor's Office, and reviewed by medical staff,

therefore all said herein Named Defendants all have received letters and phone calls from this plaintiff at bar, and from Facility procedures, all herein named defendant put in or filed by Facility Risk Management, to all herein named defendant.

The said witnesses in behalf of this plaintiff at bar are said Commissioner Quality Care, (C.Q.C.), Report, said Up-State University Hospital Orthopedic Doctor, that examined this plaintiff at bar, and all letters, and Facility Request Slips, and all phone calls, and phone call records, verify all Records of Medical Negligence, Gross medical malpractice, and total lack of medical care and treatment, to now cause and create Spinal Damage and worsened damage to Siatric Nerve Damage, and worsen Multiple Sclerosis, causing this plaintiff to live in severe Back, Neck, and Leg pains (7) Seven Days a week, and (24) Twenty-four a day, created herein Central New York Psychiatric Center, Staff and Medical Staff, and Mental Department, and Administrative Staff said Personal Interest, and, or Personal Involvement, and Individual

Capacity, and working under the Colors of the State,

5.

CAUSES OF ACTION -

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

Assignment of Counsel,
File Plaintiff 42 U.S.C. § 1983, as a Civilian - Not a Prisoner
Process Form 42 U.S.C. § 1983,
Process Plaintiff Forma Pauperis - Poor Person Application
Process Defendant Summons, and Marsh Forms.

SECOND CAUSE OF ACTION

Process 42 U.S.C. § 1983, For Trial
Process For Trial, For Compensatory Damages, and
Punitive Damages Against Defendant Grace Saxe.
Schedule Discovery Motions, and Hearing, And Compensatory
Damages and Punitive Damages Against All Defendant(s)

THIRD CAUSE OF ACTION

File 42 U.S.C. § 1983 against All Defendant(s) pursuant
to Official and Personal Capacities, for working under
Color of State

6. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

Process Plaintiff 42 U.S.C. § 1983, and Process Defendants
Summon and March Forwards, and Schedule Trial, and
Award Damages, and Prosecute Defendant(s) "if" Court
Fines Defendant(s) Violated Plaintiff Rights, and Violated
State and Federal Laws and Constitutions.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: January 25, 2021



Lorenzo Wood
Signature of Plaintiff(s)
(all Plaintiffs must sign)

02/2010